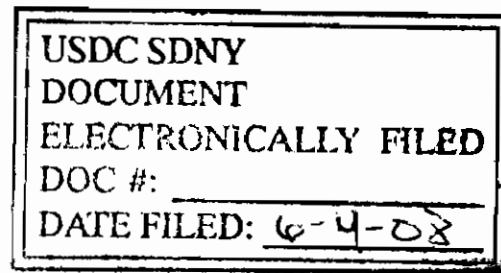


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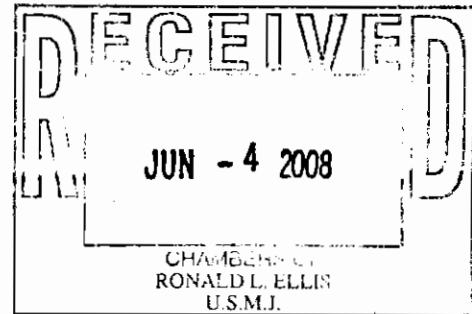
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June 2, 2008

The Honorable Ronald L. Ellis
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

RE: *Fulford v. City of New York, et al.*
07 CV 8247



Dear Judge Ellis:

This firm represents plaintiff Mary Fulford in a civil complaint against the City of New York and two individually named police officers for excessive force and other constitutional violations. I write to request an extension of time until July 29, 2008 to complete factual discovery in this case with the consent of defense counsel Hugh Zuber, as Assistant Corporation Counsel. By order dated February 29, 2008, the Court granted until May 29, 2008 for the completion of factual discovery. This is the first request for an extension of time for discovery by either party.

The parties have almost finished the discovery process, completing the deposition of plaintiff, document discovery and the exchange of other relevant information. At this point, all that remains to be done is the depositions of the two individually named defendants, minimal document discovery and expert discovery.

I am requesting additional time for factual discovery so as to obtain a forensic medical examination of Ms. Fulford's shoulder, necessary to determine the extent of damage and to formulate and present a demand to the City. Ms. Fulford has claimed her shoulder was injured by defendant police officer Caputo when he forcibly removed her from her parked vehicle.

In an effort to minimize additional time and cost spent in prosecuting this claim, the additional time requested would enable plaintiff to formulate, present and negotiate a settlement demand, in the hope this case will settle absent the cost of additional depositions. If a settlement is unlikely, plaintiff will complete all factual discovery by July 29, 2008.

Extension granted

Thank you for your considerations.

Yours truly,



COLLEEN M. MEENAN

CMM:emm

Cc: Hugh Zuber, Esq.

SO ORDERED

Ronald L. Ellis 6-4-08

MAGISTRATE JUDGE RONALD L. ELLIS